

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JULIE HODGE,

Plaintiff,

V.

NORTHERN ILLINOIS REGIONAL
COMMUTER RAILROAD CORP.,

Defendant.

Case No. 24 C 02226

Hon. Jorge L. Alonso

Magistrate Judge Beth W. Jantz

**AGREED MOTION TO WITHDRAW DEFENDANT’S MOTION TO DISMISS
(DOC. #9) AND FOR LEAVE FOR DEFENDANT TO FILE AN ANSWER**

Defendant, Northern Illinois Regional Commuter Railroad Corporation, (“Defendant”),
by and through its attorneys, for its Agreed Motion, states as follows:

1. On May 20, 2024, Defendant filed its Motion to Dismiss (Doc. #9).
2. On June 25, 2024, undersigned counsel entered his Appearance (Doc. #17), as Defendant had just retained undersigned counsel to act as lead counsel in this matter.
3. Upon review of Defendant's Motion to Dismiss (Doc. #9) and Plaintiff's Response (Doc. #24), Defendant moves to withdraw its Motion to Dismiss (Doc. #9).
4. Defendant also seeks leave from this Court to file its Answer by or on August 9, 2024.
5. Defendant does not bring this Motion for the purpose of delay, and no party would be prejudiced by granting the relief sought in this Motion.
6. Undersigned counsel has discussed this Motion with Plaintiff's counsel, and Plaintiff's counsel has informed the undersigned counsel that Plaintiff agrees to this Motion.

Wherefore, Northern Illinois Regional Commuter Railroad Corporation, respectfully requests that this Honorable Court withdraw Defendant's Motion to Dismiss (Doc. #9) and grant Defendant leave to file its Answer by or on August 9, 2024, and for any other relief the Court deems proper and just.

Dated: July 19, 2024

Respectfully submitted,

NORTHERN ILLINOIS REGIONAL
COMMUTER RAILROAD CORPORATION

/s/David V. Cascio

David V. Cascio

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Attorney for Defendant

CERTIFICATE OF SERVICE

I, David V. Cascio, an attorney, hereby certifies that he caused the foregoing **Motion to Withdraw and For Leave to File Answer** in the above-captioned matter to be filed with the Court and served upon the parties of record listed below, via the Court's e-filing system, on this 19th day of July, 2024, addressed to:

Kendra Danielle Spearman
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/s/David V. Cascio